

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

MICHAEL SNELLING,)	
)	
Plaintiff,)	CIVIL ACTION FILE NO.
)	1:16-CV-00130-CC-AJB
v.)	
)	
OFFICER STROY,)	
)	
Defendant.)	
)	
)	
)	

DEFENDANT'S FIRST REQUESTS FOR ADMISSIONS OF FACT TO PLAINTIFF

COMES NOW Defendant Robert Stroy, by and through undersigned counsel, and hereby serves his First Requests for Admissions of Fact upon Plaintiff pursuant to Fed. R. Civ. Pro. 36.

INSTRUCTIONS

1. Each admission shall be responded to separately and fully in writing, shall be verified under oath, and shall be served upon the Defendant's undersigned counsel at the address listed below within thirty (30) days from the date of service. Responses shall contain all information known to you, your representatives, agents, or others who have obtained information for you or on your behalf, or ascertainable by any of these persons by reasonable inquiry.

2. The admissions which follow are to be considered as

continuing, and you are requested to provide, by way of supplementary answers thereto, such information as you or any person acting on your behalf may hereafter obtain which will augment or otherwise modify your answers now given to the admissions below. Such supplementary responses are to be filed and served upon Defendant within thirty (30) days after receipt of such information.

ADMISSIONS

Pursuant to Fed. R. Civ. Pro. 36, Defendant requests that Plaintiff respond to the following:

1.

Admit that Defendant was unaware that Inmate Thomas posed a risk of physical harm to Plaintiff.

2.

Admit that Defendant never received any documentation from any Fulton County Jail personnel informing him that Inmate Thomas posed a risk to Plaintiff.

3.

Admit that Defendant was not aware that any grievances had been filed against Inmate Thomas.

4.

Admit that you were not aware that Inmate Thomas intended to assault you prior to the assault.

5.

Admit that you did not file any grievances against Inmate Thomas prior to the assault.

6.

Admit that you never informed any Fulton County Jail staff that Inmate Thomas posed a threat to you prior to the assault.

7.

Admit that you never informed Defendant that Inmate Thomas posed a threat to you prior to the assault.

8.

Admit that you did not see Defendant escort Inmate Thomas into the location in which he assaulted you.

9.

Admit that you did not see Defendant remove any physical restraints from Inmate Thomas prior to the assault.

10.

Admit that Defendant was not aware that you were present at the kiosk machine when he allegedly released Inmate Thomas from restraints.

OFFICE OF THE FULTON COUNTY ATTORNEY

Patrise Perkins-Hooker
County Attorney
Georgia Bar No. 572378

Kaye Woodard Burwell
Deputy County Attorney
Georgia Bar No. 775060

/s/ Ashley J. Palmer

Ashley J. Palmer
Senior Attorney
Georgia Bar No. 603514

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CERTIFICATE OF SERVICE

This is to certify that I have this day served the following *pro se* Plaintiff with a copy of "**DEFENDANT'S FIRST REQUESTS FOR ADMISSIONS OF FACT TO PLAINTIFF**," which has been prepared in Courier New, 12 point type, as approved by the Court in Local Rule 5.1C, by U.S. Mail and addressed as follows, and that I have electronically filed the foregoing with the Clerk of Court using the CM/ECF system:

Michael Snelling, Jr.
GDC# 1099143
Baldwin State Prison
P.O. Box 218
Hardwick, Georgia 31034

This 11th day of April, 2017.

/s/ Ashley J. Palmer
Ashley J. Palmer
Senior Attorney
Georgia Bar No. 603514

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